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*Attorneys for Defendant Alex Oladele*

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA**

RESEAU DOCTEUR, INC., a Delaware  
Corporation,  
Plaintiff,

v.  
ALEX OLADELE, an individual,  
Defendant

Case No.: 2:21-cv-01795-GMN-VCF

**STIPULATION AND [PROPOSED]  
ORDER TO TRANSFER VENUE TO  
UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF  
GEORGIA**

Pursuant to 28 U.S.C. § 1404(a), Defendant Alex Oladele ("Mr. Oladele"), by and through his counsel of record, the law firms of Peterson Baker, PLLC and Walker & Associates LLC, and Plaintiff Réseau Docteur, Inc., ("RDI"), by and through its counsel of record, the law firm of Greenspoon Marder LLP, hereby consent to and jointly seek an Order transferring this action to the United States District Court for the Northern District of Georgia. In support thereof, Mr. Oladele and RDI state as follows:

1. RDI filed its Complaint [ECF No. 1] ("Complaint") against Mr. Oladele on September 28, 2021.

1           2. Copies of the Summons and the Complaint were served on Mr. Oladele in Atlanta,  
 2 Georgia on October 25, 2021. (*See Affidavit of Service [ECF No. 11].*)

3           3. Pursuant to the Court's Order [ECF No. 14] approving the parties' stipulation dated  
 4 November 16, 2021 [ECF No. 12], Mr. Oladele was granted an extension of time to and including  
 5 December 3, 2021, to file and serve his answer or other response to the Complaint.

6           4. Pursuant to 28 U.S.C. § 1404(a), the Court may, "[f]or the convenience of parties  
 7 and witnesses" and "in the interest of justice", transfer this action to any other district "where it  
 8 might have been brought or to any district or division to which all parties have consented."

9           5. Counsel for Mr. Oladele and RDI have met and conferred regarding transferring this  
 10 action to the United States District Court for the Northern District of Georgia.

11          6. Mr. Oladele and RDI agree this action could have been filed in the United States  
 12 District Court for the Northern District of Georgia.

13          7. Mr. Oladele and RDI consent to the transfer of this action to the United States  
 14 District Court for the Northern District of Georgia for the convenience of the parties and witnesses  
 15 and in the interest of justice.

16          8. Mr. Oladele and RDI respectfully request that an Order be entered pursuant to 28  
 17 U.S.C. § 1404(a) transferring this action from the United States District Court, District of Nevada  
 18 to the United States District Court for the Northern District of Georgia.

19          9. Nothing in this Stipulation modifies the deadlines agreed to by the parties and  
 20 approved in the Court's Order [ECF No. 14].

21          10. Should the Court approve this Stipulation, Mr. Oladele and RDI shall bear their own  
 22 attorneys' fees related to the transfer of venue; however, Mr. Oladele and RDI agree to equally  
 23 share in any filing fees that may be required by the transfer.

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25        //

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28        //

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1       11. This Stipulation is not for the purpose of delay and does not prejudice any party.

2       Respectfully submitted this 29th day of November, 2021.

3                   PETERSON BAKER, PLLC

4                   GREENSPOON MARDER LLP

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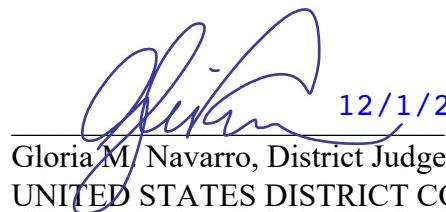
30      *Attorneys for Plaintiff Réseau Docteur, Inc.*

31      *Attorneys for Defendant Alex Oladele*

32                   **IT IS SO ORDERED.**

33                   December

34      Dated this 1 day of [REDACTED], 2021.

35                     
36                   Gloria M. Navarro, District Judge  
37                   UNITED STATES DISTRICT COURT

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